

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

IN RE:

**EZELL MORRIS
BETTY DELORIS MORRIS,

DEBTOR.**

**Case No.: BK-15-10181-
Chapter 13**

OBJECTION TO CHAPTER 13 PLAN OF DEBTOR

Comes now the secured creditor, LPP Mortgage Ltd., by their attorney, Robert Hauge, and hereby objects to the Chapter 13 Plan of Debtor. In support of this Objection, LPP Mortgage Ltd. would show the Court as follows:

1. LPP Mortgage Ltd. is the holder of a purchase money note and mortgage on the residence, ("mortgaged property") of Debtor. Said note and mortgage has an estimated outstanding balance of \$49,439.78 plus accruing interest along with reasonable attorney fees and for all costs of the action.

2. The proposed Chapter 13 Plan of the Debtor reflects an arrearage amount of \$6,900.00. LPP Mortgage Ltd. disputes this amount and would propose that the correct estimated arrearage amount is \$15,528.93.

WHEREFORE, PREMISES CONSIDERED, secured creditor, LPP Mortgage Ltd., moves the Court to reject the proposed Chapter 13 Plan of Debtor and/or to grant adequate protection or such other and further relief as may be entitled.

LPP MORTGAGE LTD.,

By: s/ Robert Hauge
ROBERT HAUGE - #20007
Baer, Timberlake, Coulson & Cates, P.C.
6846 South Canton, Suite 100
Tulsa, Oklahoma 74136
Telephone: (918) 491-3100
Fax: (918) 497-5927
Attorney for Movant

CERTIFICATE OF SERVICE

I hereby certify that I mailed a true and correct copy of the above and foregoing Objection with postage thereon fully prepaid to the parties listed below on February 5, 2015.

Ezell Morris
Betty Deloris Morris
317 N. W. 84th
Oklahoma City, OK 73114

The following persons should have received notice of the above and foregoing instrument on the same day it was filed by the Court's CM/ECF Electronic Noticing System.

John Hardeman
P.O. Box 1948
Oklahoma City, OK 73101

Bruce F. Klein
222 N.W. 13th
Oklahoma City, OK 73103

By: s/ Robert Hauge
ROBERT HAUGE - #20007